

## Rose-Coss, Dylan H, EMNRD

---

**From:** Rose-Coss, Dylan H, EMNRD  
**Sent:** Thursday, May 16, 2019 4:37 PM  
**To:** 'Rebecca Haskell'; DeAnn Grant; Weaver, Crystal (caweaver@blm.gov)  
**Cc:** jamos@blm.gov; dmckinne@blm.gov; Jennifer Knowlton; Ike Tavarez; Robert McNeill; Sheldon Hitchcock; Dakota Neel  
**Subject:** RE: (Resubmittal) COG Stratocaster 20 Fed #3H Work Plan Approval Request (1RP-5255)

Ms. Haskell,

Yes, the proposed remediation activities are approved. I will update the administrative record to reflect the approval momentarily.

However, with regards to 19.15.29.13 D (1), the restoration of the uppermost 4 ft of soils within the pad can be deferred until such time as the pad is decommissioned. That is, the production pads are not ultimately exempt from the restoration part of the rule. In this instance though, remediation activities may proceed as proposed.

Thanks for your thought and attention to the matter.

The NMOCD will be on the lookout for the report on closure activities by August 14, 2019.

Regards,

**Dylan Rose-Coss**

*Environmental Scientist*  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

(505) 476-3488

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

---

**From:** Rebecca Haskell <RHaskell@concho.com>  
**Sent:** Thursday, May 16, 2019 3:57 PM  
**To:** Rose-Coss, Dylan H, EMNRD <DylanH.Rose-Coss@state.nm.us>; DeAnn Grant <agrant@concho.com>; Weaver, Crystal (caweaver@blm.gov) <caweaver@blm.gov>  
**Cc:** jamos@blm.gov; dmckinne@blm.gov; Jennifer Knowlton <jknowlton@concho.com>; Ike Tavarez <itavarez@concho.com>; Robert McNeill <RMcNeill@concho.com>; Sheldon Hitchcock <SLHitchcock@concho.com>; Dakota Neel <DNeel2@concho.com>  
**Subject:** [EXT] RE: (Resubmittal) COG Stratocaster 20 Fed #3H Work Plan Approval Request (1RP-5255)

Mr. Rose-Cross,

Per our conversation on May 10, 2019, the spill area that is off pad is under Table 1 limits for groundwater less than 50 feet and the area on pad only had two areas (AH-3 and AH-4) with TPH concentrations above RRAL limits. 19.15.29.13 D (1) only applies to spills in the pasture (off pad) and not to on pad spills. COG is proposing to excavate the areas represented by AH-3 and AH-4 to approximately six-inches, all other areas are below RRAL limits. Are the proposed activities approved? I appreciate you taking time to discuss this with me.

Thank You,

Becky Haskell  
Senior HSE Coordinator  
COG Operating LLC  
600 W Illinois Avenue | Midland, TX 79701  
Direct: 432-818-2372 | Main: 432.683.7443  
Cell: 432-556-5130  
[rhaskell@concho.com](mailto:rhaskell@concho.com)



CONFIDENTIALITY NOTICE: The information in this email may be confidential and/or privileged. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information herein, is prohibited. If you received this email in error, please immediately notify the sender by return email and delete this email from your system. Thank you.

---

**From:** Rose-Coss, Dylan H, EMNRD [<mailto:DylanH.Rose-Coss@state.nm.us>]  
**Sent:** Friday, May 10, 2019 12:49 PM  
**To:** DeAnn Grant <[agrant@concho.com](mailto:agrant@concho.com)>; Weaver, Crystal ([caweaver@blm.gov](mailto:caweaver@blm.gov)) <[caweaver@blm.gov](mailto:caweaver@blm.gov)>  
**Cc:** [jamos@blm.gov](mailto:jamos@blm.gov); [dmckinne@blm.gov](mailto:dmckinne@blm.gov); Jennifer Knowlton <[jknowlton@concho.com](mailto:jknowlton@concho.com)>; Ike Tavaréz <[itavarez@concho.com](mailto:itavarez@concho.com)>; Robert McNeill <[RMcNeill@concho.com](mailto:RMcNeill@concho.com)>; Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>  
**Subject:** [External] RE: (Resubmittal) COG Stratocaster 20 Fed #3H Work Plan Approval Request (1RP-5255)

Ms. Grant,

The NMOCD has reviewed the Work Plan for the COG Stratocaster 20 Fed #3H (1RP-5255) release which occurred on 10/22/2018. The Division approves the workplan with a few caveats:

- The Division is satisfied the areas meant to be represented by samples AH-5, AH-6 and AH-7 did not contain soils with any constituents above the recommended remedial action levels (RRAL) and that no further action is required within those areas.
- The Division agrees that because the areas represented by samples AH-3 and AH-4 contained soils with TPH concentrations above the RRAL levels, that the soils within that area should be removed and remediated.
- However, pursuant to 19.15.29.13 D (1)  
"The reclamation must contain a minimum of four feet of non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. The soil cover must include a top layer, which is either the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater."
- Therefore, the areas represented by samples AH-1 and AH-2 require remediation due to the reported chloride concentrations in those locations up to 1.5 ft depth.

To fulfill closure requirements for this site (1RP-5255) the NMOCD requests that all areas meant to be represented by samples AH-1 through AH-4 be remediated to 1.5 ft and that sufficient bottom and sidewall samples be taken to demonstrate compliance with NMAC 19.15.29.

Thanks,

**Dylan Rose-Coss**

*Environmental Scientist*  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

(505) 476-3488

---

**From:** DeAnn Grant <[agrant@concho.com](mailto:agrant@concho.com)>

**Sent:** Friday, May 10, 2019 10:25 AM

**To:** Rose-Coss, Dylan H, EMNRD <[DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us)>; Weaver, Crystal (<[caweaver@blm.gov](mailto:caweaver@blm.gov)>)

**Cc:** [jamos@blm.gov](mailto:jamos@blm.gov); [dmckinne@blm.gov](mailto:dmckinne@blm.gov); Jennifer Knowlton <[jknowlton@concho.com](mailto:jknowlton@concho.com)>; Ike Tavaréz <[itavarez@concho.com](mailto:itavarez@concho.com)>; Robert McNeill <[RMcNeill@concho.com](mailto:RMcNeill@concho.com)>; Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; DeAnn Grant <[agrant@concho.com](mailto:agrant@concho.com)>

**Subject:** [EXT] (Resubmittal) COG Stratocaster 20 Fed #3H Work Plan Approval Request (1RP-5255)

Mr. Rose-Coss/Ms. Weaver,

Please find the attached Work Plan for the COG Stratocaster 20 Fed #3H (1RP-5255) release which occurred on 10/22/2018. The work plan was originally submitted to the NMOCD District 1 Office on January 10, 2019 and resubmitted March 11, 2019. COG is requesting that you review this work plan.

Thank you,

**DeAnn Grant**

HSE Administrative Assistant

[agrant@concho.com](mailto:agrant@concho.com)

COG Operating LLC

600 W Illinois Avenue | Midland, TX 79701

Direct: 432-253-4513 | Main: 432.683.7443



---

**From:** DeAnn Grant

**Sent:** Monday, March 11, 2019 4:44 PM

**To:** [emnrd-ocd-district1spills@state.nm.us](mailto:emnrd-ocd-district1spills@state.nm.us); [caweaver@blm.gov](mailto:caweaver@blm.gov)

**Cc:** [jamos@blm.gov](mailto:jamos@blm.gov); [dmckinne@blm.gov](mailto:dmckinne@blm.gov); Jennifer Knowlton <[jknowlton@concho.com](mailto:jknowlton@concho.com)>; Ike Tavaréz <[itavarez@concho.com](mailto:itavarez@concho.com)>; Robert McNeill <[RMcNeill@concho.com](mailto:RMcNeill@concho.com)>; Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; Rebecca Haskell <[RHaskell@concho.com](mailto:RHaskell@concho.com)>; DeAnn Grant <[agrant@concho.com](mailto:agrant@concho.com)>

**Subject:** (Resubmittal) COG Stratocaster 20 Fed #3H Work Plan Approval Request (1RP-5255)

To Whom It May Concern,

Please find the attached Work Plan for the COG Stratocaster 20 Fed #3H (1RP-5255) release which occurred on 10/22/2018. The work plan was originally submitted to the NMOCD District 1 Office on January 10, 2018. COG is requesting that you review this work plan.

Thank you,

**DeAnn Grant**

HSE Administrative Assistant

[agrant@concho.com](mailto:agrant@concho.com)

COG Operating LLC

600 W Illinois Avenue | Midland, TX 79701

Direct: 432-253-4513 | Main: 432.683.7443



---

**From:** Gonzales, Clair [<mailto:Clair.Gonzales@tetrattech.com>]

**Sent:** Thursday, January 10, 2019 2:41 PM

**To:** Hernandez, Christina, EMNRD <[Christina.Hernandez@state.nm.us](mailto:Christina.Hernandez@state.nm.us)>; Tucker, Shelly <[stucker@blm.gov](mailto:stucker@blm.gov)>

**Cc:** Carmona, Mike <[Mike.Carmona@tetrattech.com](mailto:Mike.Carmona@tetrattech.com)>; Ike Tavarez <[itavarez@concho.com](mailto:itavarez@concho.com)>; Rebecca Haskell

<[RHaskell@concho.com](mailto:RHaskell@concho.com)>; Dakota Neel <[DNeel2@concho.com](mailto:DNeel2@concho.com)>; Sheldon Hitchcock <[SLHitchcock@concho.com](mailto:SLHitchcock@concho.com)>; DeAnn Grant <[agrant@concho.com](mailto:agrant@concho.com)>

**Subject:** [External] COG Stratocaster 20 Fed #3H Work Plan Approval Request (1RP-5255)

\*\*\*\* External email. Use caution. \*\*\*\*

Good Afternoon,

Attached is the work plan for the above referenced site, located in Lea County, New Mexico. Once approved, COG will implement the work plan. Let me know if you have any questions or concerns.

Thank you

**Clair Gonzales**

**Clair Gonzales | Project Manager**

Phone: 432.687.8123 | Mobile 432.260.8634 | Fax: 432.682.3946

[clair.gonzales@tetrattech.com](mailto:clair.gonzales@tetrattech.com)

Tetra Tech | Complex World, CLEAR SOLUTIONS™

901 West Wall Street, Ste 100 | Midland, TX 79701 | [www.tetrattech.com](http://www.tetrattech.com)

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.